

# NANESS, CHAIET & NANESS, LLC

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May 7, 2020

## VIA ECF

Honorable Lewis J. Liman  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 701  
New York, NY 10007

Re: Rojas v. Three Decker Restaurant, Ltd. et al.  
Case No. 19-CV-8592(LJL)

Dear Judge Liman:

Our firm represents Three Decker Restaurant, Ltd. (“the Restaurant”), Anthanasios Raftopoulos, and Ramiro Tecorral (collectively, “the Defendants”) in the above referenced FLSA and New York Labor Law wage and hour action by Plaintiff, Florinda Maria Rojas (“Plaintiff”). The present deadline for the parties to submit a settlement agreement or status report is Friday, May 8, 2020 (please see the April 7, 2020 electronic order). For the following reasons, I write to request another one-month extension of time to submit the papers or provide a status update. Counsel for the Plaintiff, Peter H. Cooper, Esq., consents to this request.

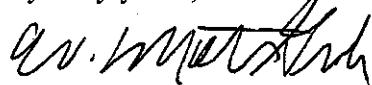
As a result of the COVID-19 pandemic, the Restaurant continues to experience severe financial difficulties, and the date that the Restaurant will be able to reopen at full capacity is still unknown. Even if the Restaurant does reopen on a full capacity basis, it is anticipated it may take time to recover from the financial impact of the COVID-19 pandemic. As a result, your undersigned and Mr. Cooper have been communicating and we both agree that another one-month adjournment to reassess the matter and update the Court at that time is appropriate.

NANESS, CHAIET & NANESS, LLC

As such, and pursuant to your Honor's Individual Rule 1.C., the parties respectfully request an extension of time from May 8, 2020 to June 8, 2020 to submit settlement papers or otherwise provide a status update. There has been one previous fourteen-day request for such an extension, as well as a one-month request for such an extension. There are no scheduled appearances.

The parties thank your Honor for your anticipated courtesies.

Very truly yours,



W. Matthew Groh

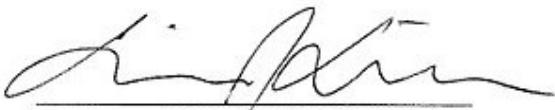
cc: Peter H. Cooper, Esq. (via ECF)

Application for extension of time GRANTED.

If the case does not settle, the following is HEREBY ORDERED in lieu of a status letter:

The parties shall appear for a telephonic status conference on June 16, 2020 at 12:00 p.m. Parties are directed to call (888) 251-2909 and use access code 2123101. In advance of the conference, and no later than June 11, 2020, the parties shall submit a proposed schedule for discovery and trial.

5/7/2020



LEWIS J. LIMAN  
United States District Judge